

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

	X	
	:	
In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. <sup>1</sup>	:	
	X	

**INFORMATIVE MOTION OF THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO, ACTING BY AND THROUGH  
ITS SPECIAL CLAIMS COMMITTEE, REGARDING ORDER ON  
PROCEDURES FOR ATTENDANCE, PARTICIPATION AND OBSERVATION  
OF THE DECEMBER 11, 2019 OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain and the Honorable Judith G. Dein, United States Magistrate Judge:

1. The Financial Oversight and Management Board for the Commonwealth of Puerto Rico (the “Commonwealth”), acting through its Special Claims Committee (the “Special Claims Committee”), hereby submits this informative motion in response to the Court’s *Order Regarding Procedures for Attendance, Participation and Observation of December 11-12, 2019 Omnibus Hearing* [ECF No. 9388] (the “Order”).

---

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. Sunni P. Beville, Esq. and Tristan G. Axelrod, Esq. of Brown Rudnick LLP will appear on behalf of the Special Claims Committee in person to address, as necessary, the following matters:

- a) *Motion of UBS Financial Services Incorporated of Puerto Rico for Relief from the Automatic Stay* [Docket No. 8823] (“UBS Financial Stay Relief Motion”);
- b) *Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, Acting by and through the Members of the Special Claims Committee and the Official Committee Of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements* [Docket No. 9254] (the “Omnibus Response Extension Motion”);
- c) *Third Interim Application of Brown Rudnick LLP, Claims Counsel to the Financial Oversight and Management Board, Acting through its Special Claims Committee, for Professional Compensation and Reimbursement of Expenses for the Seventh Interim Fee Period from June 1, 2019 through September 30, 2019* [Docket No. 9316] (“Brown Rudnick’s Third Interim Fee Application”);
- d) *Interim Report and Recommendation of the Mediation Team* [Docket No. 9365] (the “Mediation Team Report and Recommendation”);
- e) *The Marrero Plaintiffs’ Motion to Intervene*, Adversary Proceeding No. 19-00388 [Docket No. 9] (the “Marrero Motion to Intervene”).
- f) *Motion to Stay Adversary Proceeding*, Adversary Proceeding No. 19-00388 [Docket No. 28] ( the “Motion to Stay”); and

- g) Any objections, responses, statements, joinders, or replies to (i) UBS Financial Stay Relief Motion, (ii) Brown Rudnick's Third Interim Fee Application, (iii) Mediation Team Report and Recommendation, (iv) Marrero Motion to Intervene, (v) Motion to Stay, and (vi) Omnibus Response Extension Motion (collectively, the "Motions"), and any other related motions or responsive pleadings filed in connection with those matters; and
  - h) Any other matters scheduled for the Hearing or statements made by any party in connection with the Title III cases, objections or any adversary proceeding pending therein.
3. Alberto G. Estrella, Esq. and Kenneth C. Suria, Esq. of Estrella LLC and Ileana C. Cardona Fernández, Esq. may also be attending the Hearing on behalf of the Special Claims Committee by telephone or in person in Courtroom 3 at the United States District Court for the District of Puerto Rico, Clemente Nazario Courthouse, 150 Carlos Chardón Street, San Juan, PR 00918-1767.

*[The balance of this page is intentionally blank]*

WHEREFORE, the Oversight Board respectfully requests that the Court take notice of the foregoing.

Dated: December 6, 2019

/s/ Edward S. Weisfelner

BROWN RUDNICK LLP

Edward S. Weisfelner, Esq. (*Pro Hac Vice*)

Angela M. Papalaskaris, Esq. (*Pro Hac Vice*)

Seven Times Square

New York, NY 10036

Tel: (212) 209-4800

[eweisfelner@brownrudnick.com](mailto:eweisfelner@brownrudnick.com)

[apapalaskaris@brownrudnick.com](mailto:apapalaskaris@brownrudnick.com)

Sunni P. Beville, Esq. (*Pro Hac Vice*)

One Financial Center

Boston, MA 02111

Tel: (617) 856-8200

[sbeville@brownrudnick.com](mailto:sbeville@brownrudnick.com)

*Counsel to the Financial Oversight and Management Board, acting through the Special Claims Committee*

/s/ Alberto Estrella

/s/ Kenneth C. Suria

ESTRELLA, LLC

Alberto Estrella (USDC-PR 209804)

Kenneth C. Suria (USDC-PR 213302)

P. O. Box 9023596

San Juan, Puerto Rico 00902-3596

Tel.: (787) 977-5050

Fax: (787) 977-5090

*Local Counsel to the Financial Oversight and Management Board, acting through the Special Claims Committee*

/s/ Ileana C. Cardona-Fernández

Ileana C. Cardona-Fernández, Esq.

USDC PR Bar No. 302610

1609 Calle Orlando

Urb. Estancias de San Gerardo

San Juan, PR 00926

Tel. (787) 484-8202

[jcardona@iccflaw.com](mailto:jcardona@iccflaw.com)

*Local Conflicts Counsel to the Financial Oversight and Management Board, acting through the members of the Special Claims Committee*